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SDCO Tustin Executive Center, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:) CHAPTER 11
) CASE NO.: 8:23-bk-10571-SC
) Honorable Scott C. Clarkson
)
THE LITIGATION PRACTICE GROUP P.C.,) NOTICE OF HEARING ON MOTION
) BY SDCO TUSTIN EXECUTIVE
) CENTER, INC. FOR ALLOWANCE
) AND PAYMENT OF
Debtor.) ADMINISTRATIVE EXPENSE CLAIM
)
) Date: January 19, 2024
) Time: 11:00 a.m.
) Courtroom: 5C

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE DEBTOR, AND
ALL SCHEDULED CREDITORS AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that pursuant to Local Bankruptcy Rule 9013-1(c)(2), a hearing will be held on January 19, 2024 at 11:00 a.m. before the Honorable Scott C. Clarkson, United States Bankruptcy Judge, United States Bankruptcy Court for the Central District of California, 411 W. Fourth Street, Santa Ana, California 92701 for the Court to consider the Motion by Creditor SDCO Tustin Executive Center, Inc. ("SDCO") for Allowance and Payment of

1 Its Administrative Expense Claim.

2 **PLEASE TAKE FURTHER NOTICE** that as more fully set forth in the Motion, SDCO
3 seeks entry of an order approving and allowing the payment of an administrative expense claim
4 in the amount of \$206,045.84 under 11 U.S.C. 503(b) and 507(a)(2).
5

6 **PLEASE TAKE FURTHER NOTICE** that the Motion is made on the grounds of the
7 Debtor's and Trustee's non-payment of post-petition rent and other sums are due under a
8 commercial real property lease.

9 **PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read
10 the Motion carefully and discuss them with your attorney, if you have one. If you do not have an
11 attorney, you may wish to consult with one.
12

13 **PLEASE TAKE FURTHER NOTICE** that any response to the Motion must conform with
14 Local Bankruptcy Rule 9013-1(f)(1), must be filed with the Bankruptcy Court no less than 14
15 days prior to the above hearing date, and must be served no less than 14 days prior to the above
16 hearing date on SDCO's counsel, the Debtor, and the United States Trustee. Pursuant to Local
17 Bankruptcy Rule 9013-1(h), the failure to timely file and serve an opposition to the Motion may
18 be deemed by the Court to be consent to the relief requested in the Motion.
19

20 **PLEASE TAKE FURTHER NOTICE** that the hearing will be conducted remotely using
21 ZoomGov. Video and audio connection information for the hearing will be provided on Judge
22 Clarkson's publicly posted hearing calendar, which may be viewed online at
23 <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>.
24

25 **PLEASE TAKE FURTHER NOTICE** that pursuant to LBR 9013-1(h), the failure to file
26 and serve a timely response to the Motion may be deemed by the Court to be consent to granting
27
28

1
2 of the relief requested in the Motion.

3 Dated: November 20, 2023

LAW OFFICES OF RONALD K. BROWN, JR.

4
5 By: 

6 Ronald K. Brown, Jr.

7 Attorneys for Creditor,

8 SDCO Tustin Executive Center, Inc.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

901 Dove Street, Suite 120
Newport Beach, California 92660

A true and correct copy of the foregoing document entitled (specify): **NOTICE OF HEARING ON MOTION BY SDCO TUSTIN EXECUTIVE CENTER, INC. FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 11/20/23, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

SEE ATTACHED SERVICE LIST

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) 11/20/23, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Litigation Practice Group P.C.
Attn: President
17542 17th St., Suite 100
Tustin, CA 92780
Debtor

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 11/20/23 I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson
United States Bankruptcy Court -Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/20/23 LESLEY ALDAMA
Date Printed Name


Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

8:23-bk-10571-SC Notice will be electronically mailed to:

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Eric Bensamochan on behalf of Interested Party Courtesy NEF
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Razmig Izakelian on behalf of Plaintiff PurchaseCo 80, LLC

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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June 2012

F 9013-3.1.PROOF.SERVICE